# **EXHIBIT "A"**



République et canton de Genève **POUVOIR JUDICIAIRE** Tribunal civil Tribunal de première instance Juge du séquestre

Séguestre N°

Parvenu le

0.2 MAR. 2017

ORDONNANCE DE SEQUESTRE à l'office des poursuites de Genera 17070167V

Le créancier répond, en vertu de l'art. 273 al. 1 LP, de tout dommage causé par ce séquestre s'il venait à être établi en justice qu'il n'y avait pas de cas de séquestre en l'espèce ou que la créance n'était pas valable.

A cet effet, le créancier

est, en l'état, dispensé de fournir des sûretés

Titre et date de la créance / cause de l'obligation :

Arret n°1083/R de la Cour d'appel de Bucarest, llème section pénale, rendu le 25 mai 2012 dans la cause n° 86/299/2003 (2367/2011), déclaré exécutoire en Sulsse par ordonnance OTPI/572/15 du 24 septembre 2015 du Tribunal de première instance

# Cas de séquestre :

Article 271 al, 1 ch. 6 LP

#### Créance:

CHF 165'567'356.39

Genève, le 1er mars 2017

### Débiteur

Monsieur Kamuran CORTUK Ulus Mah Kelaynak Sokak Panorama Sitesl 7 Block nº 17/6-2, 34340 Besiklas, Istanbul, Turquie

#### Créancler

BANCA TURCO ROMANA SA EN LIQUIDATION, Bulevardul Voluntari Nr. 88 Voluntari, Roumanie, aglssant par son liquidateur FONDUL DE GARANTARE A DEPOZITELOR BANCARE, Strada Negru Voda 3, Corp A3, Etalul 2, Sector 3, Bucarest, Roumanie

# Mandataire du créancler

Me Yves KLEIN Monfrini Crettol & Associés 3, place du Molard 1204 Genève

avec intérêts à %

1,75% sur CHF 71'482'058.79

du

1er janvier 2017

Le juge du séquestre

Les objets à séquestrer sont décrits au verso de l'ordonnance.

Ob	ets	à	séq	ues	trer
UD	Cra	44	200	400	

a. en mains de WPS SA - Wealth Planning Services, 5, rue de l'Université, 1205 Genève, de toutes espèces, valeurs, Illres ou créances appartenant de fait ou de droit à Kamuran CORTUK ou sous autre désignation conventionnelle ou numérique, ou sur lesquels il dispose d'une procuration de fait ou de droit, soit notamment :

i. toutes créances dont Kemuren CORTUK est directement <del>ou indirectemen</del>t-titulaire à l'égard de WPS SA, notamment créance en restitution des droits relatifs à ROWENA VENTURE LTD, TENEO HOLDINGS LTD, FLOHR WORLDWIDE INVESTMENTS LTD et TEMPUS FOUNDATION.

ii. toutes autres créances liées à l'activité statulaire de WPS SA dont Kamuran CORTUK est directement ou indirectement

b. en mains de Me Thierry BOUNOUS, dont le domicile professionnel est sis 22, rue Général Dufour, 1204 Genève, et la domicile privé 1, avenue du Cardinal-Mermillod, 1227 Carouge, tous avoirs, titres ou créances appartenant de fait ou de droll à Kamuran CORTUK ou sous autre désignation conventionnelle ou numérique, ou sur lesquels il dispose d'une produration de fait ou de droit, soit notamment :

i. action de TENEO HOLDINGS LTD détenue par Me Thierry BOUNOUS

ii. toutes créances dont Kamuran CORTUK est directement eu indirectement-titulaire à l'égard de Me Thierry BOUNOUS, notamment créance en restitution des droits liés à l'action de TENEO HOLDINGS LTD détenue per Me Thierry BOUNOUS, iii. toutes autres créances llées à l'activité professionnelle de Me Thierry BOUNOUS dont Kamuran CORTUK est directement ou/ladfrectement/Itulaire.

Frais et dépens			Etat des frals				
Vules art. 104 al. 1, 106 al. 2 el 111 CPC el 80 RTFMC, condamno Lamou (cun CORTULE	Fr.21α:0,	Date Mola Jour 03 02		Autorisation et expédition d'une ordonnance de séquestre, y compris l'envoi au fanctionnaire chargé de l'exécution (art. 48 OELP et 95 66 CPC)	Emoluments et déhours		
Le juge du séquestre :  Indication des votes de recours: La charison sur les trais na peut être attequée séparément que par un recours perdevent la Cour de justice, Place du Bourg-de-Four 1, case postals at 08, 1211 Genève 3, dans les 10 jours qui suivent se notification (art. 110 et 319 ss CPC). La suspension des délais prévue par l'ert. 145 CPC ne s'applique pas.	DEPE	TSE EFFE		Expédition de séquestre Copie pour le créancier Copie pour le débiteur	14 ma*3 /		

#### Observations

Il sul interde au débilour, sous monace des peines prévues par la loi (pri. 169 CP), de disposar des biens ééquestrés sans la pormission du préposé (er, 276 et 56 LP). f. Effett du séquestre

acu el mo um;. L'ortice des poursuites peut prendre les objeté écué se gerde ou les placer aous celle d'un ders.

gous cent transcers.

Il peut dependant les talsser à ta fibre disposition du débiteur, à chargo pour coloit du foumir des saimtés par un dépôt, un cautionnement actidaire ou une autre sainté équivaiente (art. 277 LP).

Vales de drall Voles de drull 

j) Opposition (art. 278 LP) 

j) Opposition (art. 278 LP) 

Cetal dont les droits sont touchés par un adquestre pour feritier opposition 

surpris du large du réquestre dans les dix jours dès cetai où il en e eu 

connaissance. Le juge entrand les parties et statue aans related. Le décisien sur 

opposition peut faire l'orige d'un reçours au sens du code de procédure civile 

(CPC). Les parties peuvrent airliquer de si foir recoveaux. 

L'exposition et le rocours n'empérhent par le séquesure de produire cas

b) Plaints (ert 17 65 LP) Les objets insalateables (on. 92 LP) no pouvent pas non plus être néquestrée. Les est 91 à 103 LP rolatis à la talue s'appaquent par analogie à l'axéculon du néquetre. Tous les revenus du usvair, les usufrats et burs produits, les rentes viaçõres, de même que les contributemen d'entretien, les pensions el prestribens de toutes sortes qui sont destinés à couvrir une perte de gain ou une prétention découlant du droit d'entratien, en perticuler les contes et les invermités en capital qui ne sont pas insulsassités en verte de Fart. 92 LP, pouvent être séquestrés, déduction faits de ce que la prépose estime Indispensable au débilaur et à sa famille.

Validation du séquettre (ort. 279 LP)
Le créancier qui a fail opérer un sérulostre sans poursulis ou action préciable
doir requer le poursule ou intentier action dans lus réx fours à compter de la
réception du procés-verbal.

- 2 MAR. 2017

préabble, il doit rectehr la positionia della reside per la popularia noiticalion de jujement.
Les détais prénus par la présent article ne courrent par :
1, pendant la procédure d'opposition in pendant la procédure de recorra contre la décision sur opposition;
2, pendant la procédure de constatation de la force exécutoire referent de la Convention au 30 octobre 2007 concernant la computationa judiciation, la recommissionaria et fiziácution des décisions en mistère contre la commissioner et fiziácution des décisions en mistère contre la commissioner pendant la procédura de recours contre la constatation de

4. Caducitá du séquestre (est. 280 LP)
Les effets du séquestre cassent lorsque la créancter:
1. Lisse écoulor les détais qui foi sont apsignes à l'antico 279;
2. huitre cu lisse périmier son action du la poursuite;
3. vois son action définisivement rejetiée.

5. Panticipation provisotre à des salates (en. 281 LP). Lorsque les objets séquestrés viennent à être saleis per un motre créptique n'ent que le séquestrant na soit dans les défais pour océrer le valide, ca demier participe des plein droit à la saleis à time previsorie. Les frait du séquestre sont prétevés sur le produit de la réalisation. Le séquestre ne crée par d'autres droits de préférence.



Republic and canton of Geneva JUDICIAL POWER Civil Court Lower Court Receiver Judge

# Receiver # c/4402/17

Received

March 2, 2017

12 - 7 - 1 - 7 ]

RECEIVING ORDER

To the local authority of Geneva for Prosecution

The creditor states that pursuant to art. 273 al. 1 LP, that if the seizure of assets was to be ordered in court, it would be baseless and of no value.

For this reason the creditor feel that he is exempt from providing any collateral

The date/reason for the debt obligation;

Order #1083/R from the appellate Court of Bucarest, Penal section #II, issued May 25,2012 for case # 86/299/2003 (2367/2011), declared enforceable in Switzerland by order OTPI/572/15 dated September 24, 2015 from the District Court

Reference for Seizure of assets;

Article 271 al, 1 ch. 6 LP

Amount of the debt:

CHF 165567356.00

Geneva March 2, 2017

Debtor

Mr. Kamuran CORTUK Ulus Mah Kelaynak Sokak Panorama Sitesl 7 Block # 17/6-2, 34340 Beslktas, Istanbul, Turkey

Creditor

BANCA TURCO ROMANIA SA IN BANKRUPCY, Bulevardul Voluntari # 88 Voluntarim Romania, acting herein by its liquidator FONDUL DE GARANTARE A DEPOZITELOR BANCARE, Strada Negru Voda 3, Corp A3, Etajul 2, Sector 3, Burarest Romania

Agent of the creditor

Mr. Yves KLEIN Monfrini Crettol & Associes 3, place du Molard 1204 Geneva

With interest at %

1.75% on 7182058.79 CHF from

January 1, 2017

The Receiver Judge

The objects to be sequestered are described on the back of the order.

April 24, 2017

## Objects to be sequestered

- a. In the possession of WPS SA- Wealth Planning Services, 5, rue de l'Universite, 1205 Geneva, all currencies, values, titles or receivables belonging de facto or by law to Kamuran CORTUK or under any other conventional or numerical identity, or any other asset for which he holds power of attorney such as:
- i. All receivables due directly or indirectly to Kamuran CORTUK through WPS SA, especially all receivables pertaining to ROWENA VENTURE LTD, TENEO HOLDINGS LTO, FLOHR WORLDWIDE INVESTMENTS I TD and TEMPUS FOUNDATION.
- ii. All other receivables tied to the statutory activity of WPS SA which is held directly or indirectly by CORTUK.
  - b. In the possession of Thierry BOUNOUS, whose office is located 22, rue General Dufour, 1204 Geneva, and whose private residence is located 1, avenue du Cardinal-Merrnlllod,1227 Carouge, all assets, titles or receivables, belonging de facto or by law to Kamuran CORTUK or under any other conventional or numerical identity, or any other asset for which he holds power of attorney such as:
  - i. Shares of TENEO HOLDINGS I.. TD held by Mr. Thierry BOUNOUS
  - ii. All receivables due directly or indirectly to Kamuran CORTUK through Mr. Thierry BOUNOUS, especially all receivables pertaining to TENEO HOLDINGS LTD held by Mr. Thierry BOUNOUS.
- iii. All other receivables tied to the professional activity of Mr. Thierry BOUNOUS for which Kamuran Kortuk is directly or indirectly the intended recipient.

FEES AND EXPENSES STA			FTHE	FEES				
Pursuant to art. 104 al 1, 105 al 2			Date	Authorization and	Emoluments and			
And 111 CPC and 89 RTFMC		Month	Day	mailing of a	Disbursements			
Orders Kamuran KORTUK		03	02	receiving order,				
To pay legal fees for		03	02	including the	FR 2000.00			
And expenses for	FR			mailing to a process				
	2000.00			server pursuant to				
	FR			(art, 48 OELP et 95				
The Judge	2000.00			CPC)				
The Judge	2000.00			,	555.80			
W.C.				Mailing for the order To the debtor To the creditor				
Appeal: The order to pay for legal fees can only be								
disputed separately by a appeal filed with the Court,								
place du Bourg-de-four 1, PO box 3108, 1211 Geneva 3								
within 10 days after receiving the order (art 110 and 319 of ss CPC)								
The suspension of the delays mentioned in art 145 CPC								
does not apply	J. J	و تلتشم	T.					
		DEPOSE	-					
		AU GREFFE	1					
Observations:		I.F	1					
1. Sequestration	na alteste maan	continuation	on of the pr	ocedure within twenty days follo	wing the reception of his			
Pursuant to art 169 CP, the debtor is prohibited from disposing of the be sequestered without the permission of the officer of the Court.	To apacia IIIcan	MARRYTE	cppy the order to pay. The procedure is continued either by seizure or banksuptry, depending on the situation of the debtor					
The office of recovery can take possession of the asset and place t	hem joythe	ld the cred	ditor has re	quested the seizure of the asset	without having filed as			
custody of a third party	\\\\\\	formal pro	ced will be	must do so within ten days follow	ring the notification of the			
to castody of a time party.  It can also leave the asset in the possession of the creditor, as collar or any other equivalent security.	ateran gdarante	judgment	557	aguar:				
2 Legal recourse	THE CY.	1 Thenton	judgment ::37  This action foes not cover:  1. The who during the procedure of opposition or the appeal thereof					
a) Opposition art 278 LP	1	Vizilautagi	2 a the procedure of enforceability pursuant to the convention of October					
The party whose assets are ordered to be sequestered may oppose	e the order		30, 2007, pertaining to the judicial competence, the admissibility and the					
within 10 days after being made aware of the order. The judge hear and issues an order right away. The decision on the opposition can	is the parties i be appealed in	execution	execution of the decision of the civil or commercial court, or during the proced of appeal against the declaration of enforceability.					
civil court (CPC) The partied then can file a new appeal, the oppose	ition and the	Ol appeal	against trie	decialation of emorceaning				
appeal thereof does not stop the order of sequestration			4. Nullification of the sequestration (art 260 LP)					
b) Complaint (art 17 LP)	2) and 91 to 100	The effect	s of the se	questration end when the credito	r:			
	P) and 91 to 100 uities,	The effect 1 is late in	s of the se	questration end when the credito xplained in art 27e	r:			
b) Complaint (art 17 LP) The assets which cannot be sequestered are (pursuant to art 92 LF LP are: all salaries, usufruct and their products, pensions and annu contributions to the maintenance or benefit intended to cover any local contributions.	iities, oss or any claim	The effect 1 Is late in 2 Withdra 3. See his	s of the se filing as e ws or allow	questration end when the credito	r:			
b) Complaint (art 17 LP) The assets which cannot be sequestered are (pursuant to art 92 LF LP are: all salaries, usufruct and their products, pensions and annu contributions to the maintenance or benefit intended to cover any lot thereof, The pensions and indemnities which according to art 92 LF	iities, oss or any claim ⊇are considere	The effect 1 Is late in 2 Withdra 3, See his	s of the sea filing as ea ws or allow procedure	questration end when the credito xplained in art 27e s his procedure to lapse be permanently rejected	r.			
b) Complaint (art 17 LP) The assets which cannot be sequestered are (pursuant to art 92 LF LP are: all salaries, usufruct and their products, pensions and annu contributions to the maintenance or benefit intended to cover any lethereof, The pensions and indemnities which according to art 92 LF seizable assets are eligible for sequestration, once the amount necessity.	iities, oss or any claim ⊇are considere	The effect 1 Is late in 2 Withdra 3, See his 5, Particip	s of the sea filing as ea ws or allow procedure	questration end when the credito xplained in art 27e s his procedure to lapse be permanently rejected e seizures (art 261 LP)				
b) Complaint (art 17 LP) The assets which cannot be sequestered are (pursuant to art 92 LF LP are: all salaries, usufruct and their products, pensions and annu contributions to the maintenance or benefit intended to cover any le thereof, The pensions and indemnities which according to art 92 LF seizable assets are eligible for sequestration, once the amount nec maintenance of the debtor and his family is deducted. 3. Validation of the sequestration.	iities, oss or any claim Pare considered essary for the	The effect 1 Is late in 2 Withdra 3, See his 5, Particip If the asse	s of the sent filing as end we or allow a procedure that the eation to the ets are seize	questration end when the credito xplained in art 27e s his procedure to lapse be permanently rejected e seizures (art 261 LP) ed by another creditor prior to th	e time of enforceability of			
b) Complaint (art 17 LP) The assets which cannot be sequestered are (pursuant to art 92 LF LP are: all salaries, usufruct and their products, pensions and annu contributions to the maintenance or benefit intended to cover any le thereof, The pensions and indemnities which according to art 92 LF seizable assets are eligible for sequestration, once the amount nec maintenance of the debtor and his family is deducted. 3. Validation of the sequestration. The creditor who has requested the sequestration without filed a pr	iities, oss or any claim Pare considered essary for the	The effect 1 Is late in 2 Withdra 3, See his 5. Particip If the asset the seizur basis. The	is of the sent filing as end with a second with a procedure the second with a second w	questration end when the credito xplained in art 27e s his procedure to lapse be permanently rejected e seizures (art 261 LP)	e time of enforceability of the seizure on a tempora			
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b) Complaint (art 17 LP) The assets which cannot be sequestered are (pursuant to arl 92 LF LP are: all salaries, usufruct and their products, pensions and annu contributions to the maintenance or benefit intended to cover any to thereof. The pensions and indemnities which according to art 92 LF seizable assets are eligible for sequestration, once the amount nec maintenance of the debtor and his family is deducted. 3. Validation of the sequestration. The creditor who has requested the sequestration without filed a pr court must do so within 10 days following reception of the affidavit. If the debtor opposes the decision, the creditor must request the re-	uities, pss or any claim are considered cessary for the rocedure with the	The effect 1 Is late in 2 Withdra 3, See his 5. Particip If the asse the seizur basis. The thereof	is of the sea of filing as ea wis or allow or procedure nation to the ets are seiz ea, the cred are sees stem	questration end when the credito xplained in art 27e s his procedure to lapse be permanently rejected e seizures (art 261 LP) ed by another creditor prior to the itor has full right to participate in	e time of enforceability of the seizure on a tempora			
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